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**RECEIVED**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

APR 21 2008 *new*  
APR 21, 2008  
MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

Gregory Champion

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

08CV2261  
JUDGE PALLMEYER  
MAG. JUDGE VALDEZ

vs.

Ca  
(Te \_\_\_\_\_)

C. Smith

Cermak Hospital

Cook County

(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")

CHECK ONE ONLY:

EMERGENCY COMPLAINT

X

COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983  
U.S. Code (state, county, or municipal defendants)

COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE  
28 SECTION 1331 U.S. Code (federal defendants)

OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR  
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

**I. Plaintiff(s):**

- A. Name: GREGORY CHAMPION
- B. List all aliases: \_\_\_\_\_
- C. Prisoner identification number: 20060080031
- D. Place of present confinement: COOK COUNTY JAIL
- E. Address: 2600 South California

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: C Smith  
 Title: ADMINISTRATIVE EMPLOYEE  
 Place of Employment: CERMAK HOSPITAL
- B. Defendant: CERMAK HOSPITAL  
 Title: \_\_\_\_\_  
 Place of Employment: CERMAK HOSPITAL (COOK COUNTY JAIL)
- C. Defendant: COOK COUNTY, a municipality  
 Title: \_\_\_\_\_  
 Place of Employment: COOK COUNTY

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

LIST ALL LAWSUITS YOU HAVE FILED IN ANY STATE OR FEDERAL COURT

- A. NAME OF CASE AND DOCKET NUMBER *Champion v Dahlquist 07C1373*
- B. APPROXIMATE DATE OF FILING ? *3/07*
- C. LIST ALL PLAINTIFFS.  
*Gregory CHAMPION*
- D. LIST ALL DEFENDANTS.  
*Ronald DAHLQUIST, C.P.A. Root, C.P.A. Cline, CPA, City of Chicago*
- E. COURT IN WHICH THE LAWSUIT WAS FILED  
*Northern DISTRICT*
- F. NAME OF JUDGE TO WHOM CASE WAS ASSIGNED.  
*Castillo*
- G. BASIC CLAIM MADE.  
*Due Process, False Arrest*
- H. DISPOSITION OF THIS CASE.  
*PENDING*
- I. DATE OF DISPOSITION

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: CHAMPION v DART  
07C4852
- B. Approximate date of filing lawsuit: 07/07
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: GREGORY CHAMPION
- D. List all defendants: THOMAS DART, Director GONIMER
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): NORTHERN DISTRICT
- F. Name of judge to whom case was assigned: PALLMEYER
- G. Basic claim made: Ave Process
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): DISMISSED
- I. Approximate date of disposition: 08/07

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: CHAMPION V TING, ET AL  
OTC 6070
- B. Approximate date of filing lawsuit: 9/07
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: GREGORY CHAMPION
- D. List all defendants: Dr. A. TING, Victoria Furlow
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): NORTHERN DISTRICT
- F. Name of judge to whom case was assigned: Pallmeyer
- G. Basic claim made: Deliberate indifference To Medical
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): PENDING
- I. Approximate date of disposition: \_\_\_\_\_

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: CHAMPION v Delia ET AL  
07c 6414
- B. Approximate date of filing lawsuit: 11/07
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: Gregory CHAMPION
- D. List all defendants: John Delia, Steven Hoffman
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): Northern District
- F. Name of judge to whom case was assigned: Pallmeyer
- G. Basic claim made: false arrest
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): Pending
- I. Approximate date of disposition: \_\_\_\_\_

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: CHAMPION V EAGLE PRINTING  
07C1702
- B. Approximate date of filing lawsuit: 5/07
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: GREGORY CHAMPION
- D. List all defendants: FRANK ROSIENSKI, KEVIN ROSIENSKI
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): NORTHERN DISTRICT
- F. Name of judge to whom case was assigned: CASTILLO
- G. Basic claim made: ILLEGAL TERMINATION
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): DISMISSED
- I. Approximate date of disposition: 06/07

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

LIST ALL LAWSUITS YOU HAVE FILED IN ANY STATE OR FEDERAL COURT

- A. NAME OF CASE AND DOCKET NUMBER CHAMPION v PARKS ET AL  
07C7267
- B. APPROXIMATE DATE OF FILING? 12/07
- C. LIST ALL PLAINTIFFS.  
GREG CHAMPION
- D. LIST ALL DEFENDANTS.  
Deputy MS. PARKS  
Deputy KING
- E. COURT IN WHICH THE LAWSUIT WAS FILED  
Northern DISTRICT
- F. NAME OF JUDGE TO WHOM CASE WAS ASSIGNED.  
Pallmeyer
- G. BASIC CLAIM MADE.  
Failure To Protect
- H. DISPOSITION OF THIS CASE.  
Pending
- I. DATE OF DISPOSITION



**LIST ALL LAWSUITS YOU HAVE FILED IN ANY STATE OR FEDERAL COURT**

- A. **NAME OF CASE AND DOCKET NUMBER** CHAMPION v Devine 08c0022
- B. **APPROXIMATE DATE OF FILING ?** 1/08
- C. **LIST ALL PLAINTIFFS.**  
GREG CHAMPION
- D. **LIST ALL DEFENDANTS.**  
DICK Devine  
DIR. GOINER  
Thomas DART
- E. **COURT IN WHICH THE LAWSUIT WAS FILED**  
Northern District
- F. **NAME OF JUDGE TO WHOM CASE WAS ASSIGNED.**  
Pallmeyer
- G. **BASIC CLAIM MADE.**  
illegal search
- H. **DISPOSITION OF THIS CASE.**  
Dismissed
- I. **DATE OF DISPOSITION**

LIST ALL LAWSUITS YOU HAVE FILED IN ANY STATE OR FEDERAL COURT

- A. NAME OF CASE AND DOCKET NUMBER *CHampion v Doody ET Al*
- B. APPROXIMATE DATE OF FILING ? *0801240*
- C. LIST ALL PLAINTIFFS. *3/08*  
*Greg Champion*
- D. LIST ALL DEFENDANTS.  
*Sargent Doody*  
*Deputy Judge*
- E. COURT IN WHICH THE LAWSUIT WAS FILED  
*Northern District*
- F. NAME OF JUDGE TO WHOM CASE WAS ASSIGNED.  
*Pallmeyer*
- G. BASIC CLAIM MADE.  
*Failure To Protect*
- H. DISPOSITION OF THIS CASE.  
*Pending*
- I. DATE OF DISPOSITION

LIST ALL LAWSUITS YOU HAVE FILED IN ANY STATE OR FEDERAL COURT

- A. NAME OF CASE AND DOCKET NUMBER CHAMPION v GODINEZ ET AL  
B. APPROXIMATE DATE OF FILING ? 03/08 08C1632  
C. LIST ALL PLAINTIFFS.  
GREG CHAMPION  
D. LIST ALL DEFENDANTS.  
GODINEZ  
SAPETA  
DEVINE  
DART  
E. COURT IN WHICH THE LAWSUIT WAS FILED  
NORTHERN DISTRICT  
F. NAME OF JUDGE TO WHOM CASE WAS ASSIGNED.  
PALMEYER  
G. BASIC CLAIM MADE.  
ILLEGAL SEARCH  
FAILURE TO PROTECT PAPERS  
H. DISPOSITION OF THIS CASE.  
PENDING  
I. DATE OF DISPOSITION

## IV. Statement of Claim: EMERGENCY COMPLAINT

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

Circa 3/18/08, I began requesting medical attention for a severe white, yellow sinus discharge. On the request sheets, I made mention that I have had this discharge for the past (9) months, ever since I was punched in face by Manuel Macon, <sup>Pursuant T 08C1240 ←</sup> on 06/15/07. After no response, I filled out (2) more medical requests, to no avail. On 04/02/08, I filed grievance & gave it to C.R.W. Ms Wright. She contacted C. Smith of Cermak & he noted that a physician was contacted & I would be called circa 04/03/08. I have not been called & the discharge is draining down my throat leaving a very nasty taste as I swallow it. I reminded Cermak that I already am in a situation similar to this one, <sup>07C6070</sup> I.E. Deliberate indifference, however they are very unprofessional & continue to treat us detainees as cattle. C. Smith & Cermak Hospital, under color of state law, are guilty of Medical deliberate indifference to my serious medical emergency, thereby violating my 14<sup>th</sup> Amendment right to due process and effective medical intervention!!  
 In addition, my 8<sup>th</sup> Amendment right to be free of cruel & unusual punishment is in violation. These people do what they want despite the presence of the <sup>deliberate indifference</sup> District Courts!!! In addition, my Naproxen pain reliever

medication prescription ran out circa 03/13/08, I have none, have requested refill numerous times to no avail. I am having "sinus headaches" that are killing Me.

Please, someone help Me !!  
oo

P.S. I included Cook County as a defendant because Carmak Hospital is a leg of Cook County (Stroger) Hospital & I wanted to be sure to name a suable entity.

Also I am once again having severe (sinus) headaches with the "usual" no medicine to fight them with !! I have been having to sell my dinner trays to other detainees to raise funds to trade for 600 mg ibuprofen from other detainees meaning I go to bed with no dinner. Cook County & Carmak hospital ought to be ashamed of themselves for this !!!  
ooo

C. Smith, responded to my grievance, acting under color of law, failed to get me Medical attention, for serious sinus infection, and keeping me with steady supply of headache pain remedy !!  
oo

I need immediate Federal intervention<sup>5</sup> as I am losing weight and I feel swallowing this nasty yellow/white/green discharge is compromising my immediate health !! This complaint is an emergency.

Revised 9/2007

## V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I want C. Smith & Cermak Hospital liable for violating my Constitutional Rights & liable for damages for pain mental & emotional suffering. I also need the courts to compel Cermak to treat what acts me // Maybe a hefty settlement might spur these people to treat pre-trial detainees within the realm of the U.S. constitution.

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

## CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 9 day of April, 2008

Gregory L. Champion  
(Signature of plaintiff or plaintiffs)

Gregory L. CHAMPION  
(Print name)

20060080031  
(I.D. Number)

1419 Woodhollow Pk.  
Flossmoor Ill 60422  
(Address)

Part-A / Control # 2008X0299Referred To: Carmack☐ Processed as a request.

## COOK COUNTY DEPARTMENT OF CORRECTIONS DETAINEE GRIEVANCE

Detainee Last Name: CHAMPIONFirst Name: GregoryID #: 2006-0020031 Div.: 5 Living Unit: 1H Date: 04/02/08

BRIEF SUMMARY OF THE COMPLAINT: I have developed once again drainage from some sort of sinus problem. I say again because ever since I was punched in the face by detainee Manuel Moran circa 6/15/07, I have had intermittent sinus drainage. For the past (3) weeks I have requested (3) times to be treated for sinus with possible drainage and as of yet there has been no response from anyone in the clinic. I am fed up with it, I think about this. I am in the middle of a large federal civil lawsuit against (2) female professionals & I do not want to be in the position of continually begging for medical intervention. If they do not learn how to handle multiple requests for sinus infection rapidly, I am afraid it is no longer a matter of if, but when I will contact them again concerning this issue. I have no other recourse but "1793" which they do not need to deal with. I need resolution on something, please. Thank you.

NAME OF STAFF OR DETAINEE(S) HAVING INFORMATION REGARDING THIS COMPLAINT:

C.P. Mr. Martin

ACTION THAT YOU ARE REQUESTING:

Some immediate help with sinus drainage problemDETAINEE SIGNATURE: Gregory R. ChampionC.R.W.'S SIGNATURE: W. J. J.DATE C.R.W. RECEIVED: 4/3/08

Please note: Decisions of the "Detainee Disciplinary Hearing Board" cannot be grieved or appealed through the use of a grievance form. All appeals must be made in writing and directly submitted to the Superintendent.